

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

JOANN INC., et al.,

Debtors.

)
) Chapter 11
)
) Case No. 25-10068 (CTG)
)
) (Jointly Administered)
)
) Re: Docket Nos. 14,113 & 225
)
) Obj. Deadline: 2/4/25 at 4:00 p.m.
) Hearing Date: 2/11/25 at 2:00 p.m.
)

JOINDER OF CERTAIN UTILITY COMPANIES TO THE
OBJECTION OF CERTAIN UTILITY COMPANIES TO THE MOTION OF DEBTORS
FOR ENTRY OF INTERIM AND FINAL ORDERS (I) APPROVING THE DEBTORS'
PROPOSED ADEQUATE ASSURANCE OF PAYMENT FOR FUTURE UTILITY
SERVICES, (II) APPROVING THE DEBTORS' PROPOSED PROCEDURES FOR
RESOLVING ADEQUATE ASSURANCE REQUESTS, (III) PROHIBITING UTILITY
PROVIDERS FROM ALTERING, REFUSING, OR DISCONTINUING SERVICE,
(IV) AUTHORIZING CERTAIN FEE PAYMENTS FOR PREPETITION SERVICES
PERFORMED, AND (V) GRANTING RELATED RELIEF

Appalachian Power Company, Ohio Power Company d/b/a AEP
Ohio, Indiana Michigan Power Company, Southwestern Electric Power
Company, Public Service Company of Oklahoma and Kentucky Power
Company (collectively, "AEP"), by counsel, hereby joins in the
*Objection of Certain Utility Companies To the Motion of Debtors
For Entry of Interim and Final Orders (I) Approving the Debtors'
Proposed Adequate Assurance of Payment For Future Utility
Services, (II) Approving the Debtors' Proposed Procedures For
Resolving Adequate Assurance Requests, (III) Prohibiting Utility
Providers From Altering, Refusing, or Discontinuing Service, (IV)
Authorizing Certain Fee Payments For Prepetition Services*

Performed, and (V) Granting Related Relief (the "Objection")
Docket No. 225), and sets forth the following:

Introduction

1. AEP adopts and incorporates by reference herein the *Introduction* section set forth in the Objection.

Facts

2. AEP adopts and incorporates by reference herein the *Facts* section set forth in the Objection.

3. The Debtors propose that the Bank Account will contain \$21,733.50 on behalf of AEP.

Facts Regarding the Utilities Section

4. AEP adopts and incorporates by reference herein the *Facts Regarding the Utilities* section set forth in the Objection because the billing and payment terms set forth in that section are essentially the same as to AEP.

5. In order to avoid the need to bring witnesses and have lengthy testimony regarding AEP's regulated billing cycles, AEP requests that this Court, pursuant to Rule 201 of the Federal Rules of Evidence, take judicial notice of its billing cycles. Pursuant to the foregoing request and based on the voluminous size of the applicable documents, AEP is providing the web site links to the following tariffs and/or state laws, regulations and/or ordinances:

Indiana -

<https://www.indianamichiganpower.com/account/bills/rates/IandMRatesTariffsIN.aspx>

Louisiana -

<https://www.swepco.com/account/bills/rates/SWEPCORatesTariffsLA.aspx>

Ohio -

<https://www.aepohio.com/account/bills/rates/AEPOhioRatesTariffsOH.aspx>

Oklahoma -

<https://www.psoklahoma.com/company/about/rates/>

Virginia -

<https://www.appalachianpower.com/company/about/rates/va/>

West Virginia -

<https://www.appalachianpower.com/company/about/rates/wv>

Michigan -

<https://www.indianamichiganpower.com/company/about/rates/mi>

Tennessee - <https://www.appalachianpower.com/company/about/rates/tn>

Arkansas -

<https://www.swepco.com/company/about/rates/AR>

Kentucky -

<https://www.kentuckypower.com/company/about/rates/>

6. Subject to a reservation of AEP's right to supplement its post-petition deposit request if additional accounts belonging to the Debtors are subsequently identified, AEP's estimated prepetition debt and post-petition deposit request is as follows:

<u>Utility</u>	<u>No. of Accts.</u>	<u>Est. Prepet. Debt</u>	<u>Dep. Request</u>
AEP	35	\$53,161.53	\$113,552 (2-month)

7. AEP held prepetition cash deposits totaling \$12,195.99 that it recouped against prepetition debt pursuant to Section 366(c)(4) of the Bankruptcy Code. No prepetition deposit amount remains after recoupment.

Discussion

9. AEP incorporates and adopts by reference the legal and factual arguments set forth in the Objection.

WHEREFORE, AEP respectfully requests that this Court enter an order:

1. Denying the Utility Motion as to AEP;
2. Awarding AEP the post-petition adequate assurance of payment pursuant to Section 366 in the amount and form satisfactory to AEP; and
3. Providing such other and further relief as the Court deems just and appropriate.

Dated: January 31, 2025

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